

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONALD CLARK WRIGHT, III,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE NO.:
v.	)	<u>1:21-CV-5197-MHC</u>
	)	
BRANDON WARREN and VICTOR HILL,	)	
in their individual and official capacities,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

COME NOW Defendants Brandon Warren and Victor Hill (hereinafter "defendants"), by and through the undersigned counsel of record, and hereby file this motion to dismiss plaintiff's complaint (Doc. 1). Pursuant to Fed. R. Civ. P. 12(b), defendants respectfully request that this Court dismiss plaintiff's complaint.

In support of this motion, defendants rely upon the arguments and citations to authority presented in the accompanying memorandum of law, which they file contemporaneously with this motion. For the reasons more fully set forth in the accompanying memorandum of law, defendants' motion should be granted.

**FREEMAN MATHIS & GARY, LLP**

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Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF participants:

William S. Cowsert  
Joseph D. Stephens  
Cowsert Heath, LLP  
P.O. Box 627  
Athens, Georgia 30603

This 13th day of January, 2022.

**FREEMAN MATHIS & GARY, LLP**

/s/ A. Ali Sabzevari

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